

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

IN RE:	:	
Thomas Wright	:	Chapter 13
	:	Case No.: 18-12162 - MDC
Debtor(s)	:	

---

**EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY**

Debtor, Thomas Wright, by and through the undersigned counsel brings this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code; and in support thereof aver the following:

1. Debtor commenced the instant Chapter 13 matter on March 30, 2018 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on January 23, 2019.
3. The subject real property is located at 907 West Duncannon Ave., Philadelphia, PA. (hereinafter referred to as “the property”) and is owned by the Debtor.
4. Debtor believes it to be in his best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Shawn Burrell with United Real Estate.
6. On or about October 19, 2022, Debtor, by and through his realtor entered into an Agreement of Sale of the property in the amount of \$170,000. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for November 15, 2022 and therefore an emergency hearing is requested.

8. The Buyer, Teshema Cottman is not and insider of the Debtor and the sale represents and arms-length transaction between the parties made without fraud and/or collusion.

9. From the sale proceeds, Debtor intends to satisfy the mortgage(s) held by Wells Fargo, along with any other liens on the property.

10. Debtor is desirous of receiving his full exemption in the sum of up to \$25,150.00 plus any remaining proceeds after all liens and the entire Chapter 13 Balance is satisfied.

**WHEREFORE**, Debtor respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the debtor such other and further relief to which they may be justly entitled.

Dated: October 20, 2022

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtors  
Sadek and Cooper, LLC.  
1500 JFK Boulevard #220  
Philadelphia, PA 19102  
215-545-0008